

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

25-CR-31-JLS

ANDRES J. PIZARRO CAMPOS a/k/a Kiki,

MAX PIZARRO CAMPOS,

CINDY S. FRANK,

EDWARD E. LEEPER JR, a/k/a Edward E. Barnes Jr., and

JAQUEZ L. THOMAS a/k/a Quez

e

Defendants.

**DEFENDANT CINDY FRANK RESPONSE TO GOVERNMENT'S
REQUEST FOR A PROTECTIVE ORDER AND REQUEST FOR MOTION
HEARING**

On behalf of Ms. Frank, I object to the government's proposed protective order (Dkt. # 61-1) and requests a motion hearing date to discuss and argue the specific provisions of the protective order in the Court's presence.

In this matter, The government provided an initial draft of a protective order

on February 26. On March 13th, the parties met and discussed concerns over the provisions. Subsequently defense counsel received a revised version of the proposed protective order that appeared to address concerns raised but also included new provisions not discussed that impinge on Ms. Frank's constitutional right to build a defense to the accusations by the Government. Specifically, an example, during the case defense counsel or any other party on their behalf are unable to provide potential "witnesses" with a summary or source of information being used against the defendants. This presents multiple problems with Ms. Frank's ability to appropriate vet information provided by witnesses or motives that may not have been explored by the Government that may impact the veracity of the information provided by the witness. This is just one example of several concerns with the protective order in current form. As it currently stands, on behalf of Ms. Frank, I object to the proposed protective order as a whole, and I join in the individualized objections raised by co-defendants' counsel (Dkt. # 69-17).

Thus, I request that the Court hold a motion hearing, so the parties can verbalize their arguments as to each provision of the protective order. This would provide the Court an opportunity to present the parties with questions, but it also may assist in facilitating a compromise between the parties on the provisions in which they currently disagree

Dated: April 18, 2024

Respectfully Submitted,

**JALLOH AND JALLOH LLC
Attorneys for Defendant Cindy
Frank**

/s/ Abdul J. Roberts

Abdul J. Roberts, Esq.

21 W. Blancke Street

Linden NJ 07036

908-363-9899 ext 4

Email: aroberts@jallohlawfirm.com